

Exhibit A

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

EARNEST SHIELDS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 10 CV 3746
)	
ILLINOIS DEPT, OF CORRECTIONS, et al.)	
)	
Defendants.)	

PLAINTIFF'S SUPPLEMENTAL DISCLOSURES PURSUANT TO FRCP 26(a)(2)

NOW COMES the Plaintiff, EARNEST SHIELDS, by and through his attorney, JAMES A. KARAMANIS, and sets forth the following Disclosures pursuant to FRCP 26(a)(2) as follows:

FRCP 26(a)(2)(B)(i) Edward G. McFarland, MD

Attached is the written report by Dr. Edward G. McFarland which outlines the opinions and bases therefore regarding testimony he will be providing in this case as an expert witness. This report is in addition to, supplements and modifies the Report of Reviewing Health Professional provided by Dr. McFarland at the inception of this case. Both reports shall serve as the basis of Dr. McFarland's opinions.

- (B)(ii) The factual information relied upon by Dr. McFarland is outlined in his report.
- (B)(iii) Dr. McFarland may use exhibits at trial, including, but not limited to, any radiographic films of the Plaintiff including MRI films, demonstrative exhibits depicting the shoulder and the pectoralis major tendon, including models, photographs or exhibits illustrating Plaintiffs injury.
- (B)(iv) Dr. McFarland's qualifications and publications are listed on his CV which is attached to this document.
- (B)(v) Dr. McFarland is in the process of obtaining a list of cases for which he as functioned as an expert in the last 4 years and Plaintiff will provide the list upon receipt and expressly reserves the right to supplement this Disclosure with the list of cases.
- (B)(vi) Dr. McFarland is in the process of providing his statement of compensation and Plaintiff will provide the statement upon receipt and expressly reserves

the right to supplement this Disclosure with such statement.

FRCP 26(a)(2)(B)(i) **John David Kenney, MD**

Attached is the written report by Dr. John David Kenney which outlines the opinions and bases therefore regarding testimony he will be providing in this case as an expert witness.

- (B)(ii) The factual information relied upon by Dr. Kenney is outlined in his report.
- (B)(iii) Dr. Kenney may use exhibits at trial, including, but not limited to, any radiographic films of the Plaintiff including MRI films, demonstrative exhibits depicting the shoulder and the pectoralis major tendon, including models, photographs or exhibits illustrating Plaintiff's injury, as well as policies and procedures regarding penal institutions and the requisite standard of care.
- (B)(iv) Dr. Kenney's qualifications and publications are listed on his CV, which is attached to this document.
- (B)(v) Dr. John David Kenney has testified and/or been deposed in a number of cases within the State of Washington during the previous 4 years. In most of these cases, Dr. Kenney testified on behalf of the defense and/or his employer. Dr. Kenney does not have information on the specific dates or case names.
- (B)(vi) Dr. Kenney's compensation is as follows:
- Medical record and documentation review is \$375 per hour.
 - Depositions are \$500 per hour with a 4 hour minimum.
 - Trial appearance is \$6000 per day plus expenses.

PLAINTIFF RESERVES THE RIGHT TO SUPPLEMENT THESE DISCLOSURES IN ACCORDANCE WITH FEDERAL RULES OF CIVIL PROCEDURE AND THE LOCAL RULES FOR THE NORTHERN DISTRICT OF ILLINOIS

Respectfully submitted,

Earnest Shields

By: //s/James A. Karamanis
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